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September 12, 2019

VIA ELECTRONIC DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Allocation and Service Rules for the 1675–1680 MHz Band, WT
Docket No. 19-116**

Dear Ms. Dortch:

Lockheed Martin Corporation (“Lockheed Martin”) submits these comments to clarify the record in the above-captioned proceeding.

In its reply comments¹, Ligado states that “Lockheed Martin notes that *its* investment to date in satellite hardware and software to support GOES Rebroadcast (“GRB”) is over \$10 million per spacecraft.” (*emphasis added*). However, we note that our comments² stated that “The investment to date in satellite hardware and software to support GRB is over \$10 million per spacecraft. NOAA’s ground system investment to support receipt of data via this service and generation of information products from it are significantly larger.” Our comments did not indicate that the amount of over \$10 million dollars in satellite hardware and software per spacecraft represented Lockheed Martin’s investment. The “over \$10 million dollars” refers to the minimum cost per spacecraft to implement the data rebroadcast capability (GRB) as defined by NOAA requirements.

¹ See Reply Comments of Ligado Networks LLC, WT Docket No. 19-116 (filed July 22, 2019), at 3.

² See Comments of Lockheed Martin, WT Docket No. 19-116 (filed June 21, 2019), at 2.

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Furthermore, Ligado misconstrues Lockheed Martin's interest in the proceeding by offering that "Lockheed has already received substantial payments for its work for NOAA."³ Lockheed Martin wishes to be abundantly clear that its interest in this proceeding greatly exceeds that of the procurement of the GOES-R series satellites. Indeed, Lockheed Martin built and manufactured the GOES-R satellites, yet it is also deeply committed generally to ensuring the distribution of reliable environmental intelligence, which is undeniably in the public interest.

Pursuant to Section 1.1206(b) of the FCC's rules, this letter is being filed electronically in the above-referenced proceeding. Please direct any questions regarding this submission to the undersigned.

Respectfully submitted,

/s/ Scott Kotler

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³ See Reply Comments of Ligado Networks, at 4.